

Permit Renewal & Amendment Source Analysis & Technical Review

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|-------------------|--|-------------------------|---------------|
| Company: | Gaf Materials Corporation | Permit No.: | 7711A |
| City: | Dallas | Project No.: | 75805 & 83987 |
| County: | Dallas | Account No.: | DB-0378-S |
| Project Type: | RNEW | Regulated Entity No.: | RN100788959 |
| Project Reviewer: | Mr. Earl Jones | Customer Reference No.: | CN600474753 |
| Facility Name: | Asphalt & Roofing Materials Manufacturing Facility | | |

Authorization Checklist

| | |
|--|-----|
| Will a new policy/precedent be established? (ED signature required if yes) | No |
| Is a state or local official opposed to the permit?(ED signature required if yes) | No |
| If yes, please provide name and title of official: | |
| Is waste or tire derived fuel involved? (ED signature required if yes) | No |
| Are waste management facilities involved?(ED signature required if yes) | No |
| Will action on this application be posted on the Executive Director's agenda? | Yes |
| Have any changes to the application or subsequent proposals been required to increase protection of public health and the environment during the review? | No |
| (If yes, please identify any permit conditions or permit limits in the Project Overview.) | |

Project Overview

The company applied for a permit renewal of Permit No 7711A which is a permit for their Line 3 roof shingle manufacturing. There was interest in this facility from the Toxicology Staff because of odors detected while they were in the area. A visit to the plant revealed emissions from the cooling portion of the Line 3 that were not represented in the existing permit. An application for an amendment was received 07/31/2001 with public notice on 07/04/2002. A VERP Application was received on 04/23/2001 for Line 1. Since Line 1 and Line 3 are not separate in the asphalt receiving and processing and are both controlled by the same electrostatic precipitator the company elected to withdraw the VERP and include Line 1 as an amendment to #7711A. The emissions in tons/year are as follows: PM₁₀ = 98.21, NO_x = 33.01, SO₂ = 3.39, CO = 26.83, VOC = 43.77. Preliminary TCEQ modeling indicated off-property PM impacts of 900 ug/m³. Dispersion modeling and corrections to the Table 1(a) were requested from the company.

Compliance History

| | |
|--|------------|
| In compliance with 30 TAC Chapter 60, a compliance history report was prepared on: | 01/02/2004 |
| The compliance period was from 09/31/98 to 10/01/2003 | |
| Was the application received after September 1, 2002? | No |
| If yes, what was the site rating? Company rating? 1.5 | |
| Provide the GroupWise document numbers and a brief description of compliance history from each database: | |
| Is the permit recommended to be denied or has the permit changed on the basis of compliance history or rating? | No |

Public Notice Information

| | | |
|----------|--|------------|
| § 39.403 | Public notification required? | Yes |
| | If no, give reason: | |
| | A. Date application received: 09/28/2000 Date Administrative Complete: | 10/17/2000 |
| | B. Small Business source? | No |
| § 39.418 | C. Date 1st Public Notice /Admin Complete/Legislators letters mailed: | 10/28/2000 |
| § 39.603 | D. Pollutants: PM, NO _x , SO ₂ , CO, & VOC | |
| | E. Date Published: 11/09/2000 in Dallas Morning News | |
| | Amendment Notice Published 07/04/2002 in Dallas Morning News | |
| | Date Affidavits/Copies received: 11/20/2000 & 07/22/2002 | |
| | F. Bilingual notice required? | Yes |
| | Language: Spanish | |
| | Date Published: 11/09/2000 & 07/04/2002 in El Extra | |
| | Date Affidavits/Copies received: 11/20/2000 & 07/22/2002 | |

Renewal/Amendment Technical Review

Permit No. **7711A**

Regulated Entity No. **RN100788959**

§ 39.604 G. Certification of Sign Posting / Application availability 12/01/2000 & 08/10/2002

H. Public Comments Received? 2

Meeting requested? NO

Meeting held?

Hearing requested? YES

Hearing held?

Was/were the request(s) withdrawn? Yes

Date: 10/11/2002

Replies to Comments sent to OCC:

Consideration of Comments:

§ 39.419 2nd Public Notification required? No

If no, give reason: If the project does not increase allowances or the compliance history is not bad, then no further comments, meetings, or notices may occur. Discuss with your attorney.

A. Date 2nd Public Notice mailed:

B. Preliminary determination

§ 39.603 C. Pollutants:

D. Date Published: in

Date Affidavits/Copies received:

E. Bilingual notice required?

Language:

Date Published: in

Date Affidavits/Copies received:

F. Public Comments Received?

Meeting requested?

Meeting held?

Hearing requested?

Hearing held?

Was/were the request(s) withdrawn?

Date:

§ 39.420 G. Consideration of Comments:

RTC, Technical Review & Draft Permit Conditions sent to OCC:

Request for Reconsideration Received?

H. Final action: Issue

Letters enclosed?

yes

30 TAC Chapter 116 Rules

§ 116.315(b) Date of expiration of permit?

12/04/2000

§ 116.310 Date written notice of review was mailed

§ 116.310 Date application for Renewal (PI-1R) received?

09/28/2000

§ 116.311(a)(2) Is the facility being operated in accordance with all requirements and representations specified in the current permit and do the emissions from the facility comply with all TCEQ air quality rules and regulations, and with the intent of the Texas Clean Air Act ? Yes

If no, explain:

§ 116.311(a)(3) Compliance with applicable NSPS? Yes

Subparts A & UU

§ 116.311(a)(4) Compliance with applicable NESHAPS? N/A

Subparts &

§ 116.311(a)(5) Compliance with applicable NESHAPS(MACT) for source categories? N/A

Subparts &

§ 116.311(a)(6) Compliance with applicable hazardous air pollutant requirements in §116.180 - 116.183? N/A

112(g) Review?

§ 116.311(b)(1) Is additional information regarding emissions from the facility and their impacts on the surrounding area required? No

§ 116.311(b)(2) Does the facility use appropriate control technology, considering costs, age and impact of emissions? Yes

§ 116.314(a) The facility meets all permit renewal requirements? Yes

§ 116.313 Permit Renewal Fee: \$ 2028 Paid? Yes

30 TAC Chapter 113 Rules

§ 113.100 Compliance with applicable MACT standards expected?

N/A

Renewal/Amendment Technical Review

Permit No. 7711A

Regulated Entity No. RN100788959

Subparts &

30 TAC Chapter 116 Rules - Amendment Requirements

Public Notice Information

§ 116.130 - 137 Was public notification for the amendment required? Yes
If no, give reason:
If yes, was notification period for 30-days? Yes
A. Date application received: 07/31/2001 Date application complete: 06/07/2002
B. Preliminary determination Issue
C. Public notice mailed: 06/07/2002
D. Final action: Issue Letters enclosed? Yes

Emission Controls

§ 116.111(2)(C) Will the facility utilize BACT? Yes
§ 116.111(2)(G) Is the facility expected to perform as represented in the application? Yes
§ 116.140 Permit Fee: \$ 450 Fee certification provided? N/A

Sampling And Testing

§ 116.111(2)(A)(i) Are the emissions expected to comply with all TCEQ air quality Rules & Regs, and the intent of the Texas Clean Air Act? Yes
§ 116.111(2)(B) Will emissions be measured? Yes
Method: Opacity & Visibility
Comments:

Federal Program Applicability

§ 116.111(2)(D) Compliance with applicable NSPS expected? Yes
Subparts A & UU
§ 116.111(2)(F) Compliance with applicable NESHAPS expected? N/A
Subparts &
§ 116.111(2)(H) Is nonattainment review required? No
A. Is the site located in a nonattainment area? No
B. Is the site a federal major source for a nonattainment pollutant? No
C. Is the project a federal major source for a nonattainment pollutant by itself? No
D. Is the project a federal major modification for a nonattainment pollutant? No
1. Did the project emission increases for nonattainment pollutant minus the two-year average actual emissions trigger netting?
If yes, attach Table 1N & 9N. If no, explain:
2. Is the contemporaneous increase significant? If yes, nonattainment review is required.
§ 116.111(2)(I) Is PSD applicable? No
A. Is the site a federal major source (100/250 tons/yr)? No
B. Is the project a federal major source by itself? No
C. Is the project a federal major modification? No
1. Did project emission increases, without decreases, for pollutant of concern, minus the two-year average actual emissions trigger netting?
2. Was contemporaneous increase significant?
3. Change excluded by 40 CFR 52.21(b)(2)(iii)?
If yes to B.2 or B.3 above, explain:

Mass Cap and Trade Applicability

§ 116.111(a)(2)(L) Is Mass Cap and Trade applicable? No
Did the proposed facility, group of facilities, or account obtain allowances to operate? N/A

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Permit No. 7711A

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Title V Applicability

- § 122.10(8)(A) Is facility a major source under FCAA Section 112(b)? No
A. Facility emits 10 tons or more of any single HAP? No
B. Facility emits 25 tons or more of a combination No
§ 122.10(8)(C) Does the facility emit 100 tons or more of any air No
§ 122.10(8)(D) Is the facility a non-attainment major source? No
Note: Fugitive emissions are not included in total emissions unless the facility is named in 30 TAC 122.10(8)(C).

Request for Comments

| | | | |
|---------|--------|--------------|----------------|
| Region: | 4 | Reviewed By: | |
| City: | Dallas | Reviewed By: | Barbara Trahan |
| County: | | Reviewed By: | |
| TARA: | | Reviewed By: | |
| Comp: | | Reviewed By: | Earl Jones |
| Legal: | | Reviewed By: | |

Process Description

GAF is a nationwide manufacturer of building materials products. The GAF Dallas Facility manufactures asphalt shingles for the roofing industry.

Asphalt roofing shingles manufacture start with a dry non-woven fiberglass mat being fed (unrolled) into the roofing shingle production line. A mechanical splicer and an accumulator are provided so a new roll can be spliced onto the end of the depleted roll without interruption of production. The fiberglass mat strand (approximately 60 inches wide) is pulled through a dip hot asphalt (powdered limestone stabilized) coater which coats both sides of the mat. Immediately after the coater ceramic granules are sprinkled onto the mat surface. As the mat goes through a reverse roller the granules are embedded into the asphalt coat and sand is sprinkled on the backside of the mat. This sand covers the asphalt and prevents sticking during the rest of the process and in the packaged shingles. The hot coated strand proceeds through cooling rolls (water cooled drums) where water is also sprayed onto the hot strand. The steam and mist vent upwards through three exhaust fans in the roof. It is then accumulated in festoons in the looper section to provide surge capacity required prior to cutting. Self-seal striping is applied in stripes and the strand is cut into shingle size and automatically packaged.

There are six major production support operations: (1) asphalt railcar unloading and storage, (2) asphalt blowing, (3) back surfacing (sand) and granule unloading and storage, (4) stabilizer unloading and storage, (5) stabilizer heating, and (6) stabilizer/asphalt mixing.

Pollution Prevention, Sources, Controls and BACT

Impacts Evaluation

1. Was modeling done? Type?
2. Will GLC of any air contaminant cause violation of NAAQS?
3. Is this a sensitive location with respect to nuisance?
4. Is the site within 3000 feet of any school?
5. Toxics Evaluation:

Miscellaneous

Is applicant in agreement with special conditions?

Company representative(s)?

Contacted via?

Date of contact?

Other permit(s) affected by this action?

If YES, list permit number(s) and actions required or taken

Yes
Fred Brite
e-mail
12/04/2003

Permit No. 7711A

Renewal/Amendment Technical Review

Regulated Entity No. **RN100788959**

Project Reviewer

Date

Team Leader/Section Manager/Backup

Date